

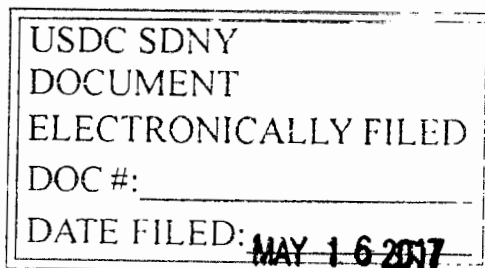
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	<u>SUPERSEDING INFORMATION</u>
	:	
- v. -	:	S28 16 Cr. 522 (RJS)
	:	
PASQUALE MAIORINO,	:	
	:	
Defendant.	:	
	:	
- - - - -	x	

COUNT ONE

The United States Attorney charges:

1. From at least August 2012, up to and including September 2012, in the Southern District of New York and elsewhere, PASQUALE MAIORINO, the defendant, and others known and unknown, unlawfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit extortion, as that term is defined in 18 U.S.C. § 1951(b)(2), by obtaining money and property from and with the consent of another person, which consent would have been and was induced by the wrongful use of actual and threatened force, violence, and fear, and thereby would and did obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in 18 U.S.C. § 1951(b)(3), to wit, MAIORINO and other co-conspirators, not named as co-



defendants herein, used actual and threatened force to collect payment on a debt owed by a particular individual ("Victim-1").

(Title 18, United States Code, Section 1951.)

FORFEITURE ALLEGATION

2. As a result of committing the offense charged in Count One of this Information, PASQUALE MAIORINO, the defendant, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461, any and all property constituting or derived from any proceeds he obtained directly or indirectly as a result of the said violation and any and all property that constitutes or is derived from proceeds traceable to the commission of the violation alleged in Count One.

Substitute Assets

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value;
or

e. has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

(Title 18, United States Code, Section 981;
Title 28, United States Code, Section 2461; and
Title 21, United States Code, Section 853.)

Joon H. Kim

JOON H. KIM
Acting United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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v.

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(18 U.S.C. § 1951.)

JOON H. KIM

Acting United States Attorney
